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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master Case No.: 3:07-cv-05944-SC
MDL No. 1917

[Honorable Samuel Conti]

This document relates to:

*Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.,
No. 11-cv-05513-SC*

*Best Buy Co., Inc., et al. v. Technicolor SA, et
al., No. 13-cv-05264-SC*

*Target Corp. v. Chunghwa Pictures Tubes,
Ltd., et al., No. 3:07-cv-05514-SC*

*Target Corp. v. Technicolor SA, et al., Case
No. 3:11-cv-05514-SC*

*Alfred H. Siegel, as Trustee of the Circuit City
Stores, Inc. Liquidating Trust v. Hitachi, Ltd.,
et al., No. 11-cv-05502-SC*

*Sears, Roebuck and Co., et. al. v. Chunghwa
Picture Tubes, Ltd., et al., No. 11-cv-5514*

**DECLARATION OF JILL S.
CASSELMAN IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE DOCUMENTS
UNDER SEAL PURSUANT TO CIVIL
LOCAL RULES 7-11 AND 79-5**

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MASTER CASE NO.: 3:07-CV-05944-SC

DECLARATION OF JILL S. CASSELMAN ISO
ADMIN. MTN TO FILE DOCS UNDER SEAL

1 *Sharp Electronics Corporation, et al. v.*
2 *Hitachi, Ltd., et al., No. 13-cv-01173-SC*

3 *Sharp Electronics Corp., et al. v. Koninklijke*
4 *Philips Electronics N.V., et al., No. 13-cv-2776*
5 *SC*

6 *ViewSonic Corporation v. Chunghwa Picture*
7 *Tubes, Ltd., et al., No. 14-cv-02510*

8 I, JILL S. CASSELMAN, declare as follows:

9 1. I am a member in good standing of the State Bar of California and am admitted to
10 practice before this Court. Except for those matters stated on information and belief, which I
11 believe to be true, I have personal knowledge of the facts recited in this declaration and, if called
12 upon to do so, I would competently testify under oath thereto.

13 2. I am an attorney at the law firm of Robins Kaplan LLP, counsel for Plaintiffs Best
14 Buy Co., Inc., Best Buy Purchasing L.L.C., Best Buy Enterprise Services, Inc., Best Buy Stores,
15 L.P., and BestBuy.com, L.L.C. (collectively "Best Buy") in the above-captioned action. I submit
16 this declaration pursuant to L.R. 79-5 in support of Plaintiffs'¹ Administrative Motion to File
17 Documents Under Seal. The statements made herein are based on my personal knowledge.

18 3. Through this Motion, Plaintiffs seek permission to file under seal portions of their
19 Opposition to Defendants Motion *in Limine* No. 11 ("Opposition") and the entirety of Exhibits 1-
20 4 ("Designated Exhibits") to the Declaration of Jill S. Casselman filed in support of the
21 Opposition.

22 4. The Opposition and Designated Exhibits contain excerpts from and/or statements
23 derived from documents and testimony which have been designated "confidential" or "highly
24 confidential" pursuant to the Stipulated Protective Order governing the *CRT Antitrust MDL*,
25 which was entered by Judge Samuel Conti on June 18, 2008 (Dkt 306). The confidential/highly
26 confidential designations were made by certain defendants in the *CRT Antitrust MDL*. To qualify

27 ¹ For purposes to this Declaration, "Plaintiffs" refers to Best Buy Co., Inc., Best Buy Purchasing
28 LLC, Best Buy Enterprise Services, Inc., Best Buy Stores, L.P. and Bestbuy.com, L.L.C., Alfred
H. Siegel, solely in his capacity as Trustee of the Circuit City Stores, Inc. Liquidating Trust,
Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of America, Inc.,
Sears, Roebuck and Co., and Kmart Corporation, Target Corp., and ViewSonic Corp.

1 as confidential or highly confidential under the Stipulated Protective Order, the information must
2 contain trade secrets or other confidential research, development or commercial information or
3 private or competitively sensitive information. (§1).

4 5. The Stipulated Protective Order requires that a party may not file any confidential
5 material in the public record (§10). The Stipulated Protective Order further provides that any
6 party seeking to file any confidential material under seal must comply with Civil Local Rule 79-5
7 (§§1, 10.).

8 6. Portions of the Opposition and the entirety of the Designated Exhibits contain such
9 confidential material and, pursuant to Local Rule 79-5(e), Plaintiffs seek to submit the above
10 material under seal in good faith in order to comply with the Protective Order in the *CRT*
11 *Antitrust MDL* and the applicable Local Rules. Specifically:

12 7. Pages 1-3 and 6-10 of the Opposition contain information that refers, contains,
13 and/or reflects excerpts of documents and testimony that have been designated as "confidential"
14 or "highly confidential" pursuant to the Stipulated Protective Order.

15 8. Exhibit 1 to the Casselman Declaration is a true and correct copy of selections
16 from the Expert Report of Dr. Kenneth G. Elzinga, dated April 15, 2014, and designated as
17 "Highly Confidential."

18 9. Exhibit 2 to the Casselman Declaration is a true and correct copy of selections
19 from the Expert Rebuttal Report of Dr. Kenneth G. Elzinga, dated September 26, 2014, and
20 designated as "Highly Confidential."

21 10. Exhibit 3 to the Casselman Declaration is a true and correct copy of E-Mail
22 Communications cited in the Elzinga Rebuttal Report, and designated as "Confidential" and
23 "Highly Confidential."

24 11. Exhibit 4 to the Casselman Declaration is an E-Mail Communication cited by the
25 Elzinga Rebuttal Report, and designated as "Confidential."

1 I declare under penalty of perjury under the laws of the United States and the State of
2 California that the foregoing is true and correct.

3 Executed on this 27th day of February 2015, at Los Angeles, California.
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5 /s/ Jill S. Casselman

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ROBINS KAPLAN I LLP
ATTORNEYS AT LAW
LOS ANGELES